

**Our File: P-974**

December 4, 2019

Ms. Rita Szilock, MCIP, RPP  
Development Planner  
Planning Approvals  
Integrated Planning & Public Works  
City of Waterloo  
100 Regina Street South  
PO Box 337 STN Waterloo  
Waterloo, ON  
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Dear Ms. Szilock:

**Re: 319, 337 & 343 Woolwich Street, Waterloo  
Resubmission of Materials in support of Zoning By-law Amendment Z-18-14**

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As you are aware, a resubmission package of materials was provided to your office on March 26, 2019. It is our understanding that the package was circulated and comments were being accumulated however due to time constraints with city staff a formal response and consolidated comments were not provided. Instead we proceeded to meet with yourself on June 18, 2019 to discuss the updated concept plan and your initial thoughts.

Further to that meeting we are pleased to submit this letter and updated concept plan and materials in support of the Zoning By-law Amendment (Z-18-14) for the lands municipally known as 319, 337 and 343 Woolwich Street, Waterloo. The proposed development has been modified based on comments received and discussions with city and agency staff and now consists of:

- Eight (8) single detached residential lots (formerly 10 lots);
- Sixteen (16) townhouse units (formerly 22 units);
- Visitor parking (6 spaces);
- Amenity space;
- Provision of a walkway to Woolwich Street (eastward); and,
- Other changes to provide suitable buffers to environmental features as per the attached plan.

In support of this resubmission, enclosed herein please find the following:

- This cover letter, complete with a response matrix to comments received;
- An updated concept plan, dated November 18, 2019;
- Functional Site Grading, Functional Site Servicing, and Functional Servicing Report as prepared by K. Smart Associates Limited. (October 22, 2019)
- Updated Environmental Impact Study prepared by RJ Burnside and Associates Limited. (November 29, 2019)
- Access Review Study by Paradigm (June 21, 2018) and additional Figures showing Sightlines.

In support of the enclosed submission, please find below our responses to the comments identified in the letter dated November 23, 2018 as provided via email from yourself as well as comments received at our meeting at the City of Waterloo on December 20, 2018 and again with yourself on June 18, 2019. A similar response table was issued to the City on March 26, 2019.

| <i>Municipal Comment</i>  | <i>Response</i>   |
|---|---|
| <b><i>Environmental Buffers</i></b>   |   |
| 1. Scoped Environmental Impact Statement (EIS) will need updating   | EIS addendum and associated mapping have been updated   |
| 2. Updated buffers to be incorporated into the Concept Plan   | Buffers have been updated in the Concept Plan and are also illustrated in the EIS addendum and associated mapping   |
| 3. Environmental Features and Environmental Buffer Areas should be zoned Conservation (OS3), conveyed to the City and as such removed from total Lot area calculation | Agreed. The area of the conveyance including buffers is ~2000m <sup>2</sup> (0.49ac)  |
| 4. No part of the development should extend over the OS3 lands  | Acknowledged. The development limits have been established as the limit of the proposed "OS3" lands.  |
| <b><i>Site Layout</i></b>   |   |
| a) Number of single detached dwellings facing Kitchener, on the north-south leg of Woolwich Street should be reduced to three (3)                                     | The concept plan has been updated so that the number of lots facing Woolwich Street on the Kitchener side (east) is now 3 (was 4).  |
| b) Rezone Environmental Features & Buffers and convey to the City - as per above 'Environmental Buffers' above  | Agreed.   |
| c) Number of single detached dwellings along the east-west leg of Woolwich Street should be reduced; allowing for environmental buffer along hedgerow.                | The number of lots along the east-west leg of Woolwich Street is reduced to 5 lots (from 6). This permits a 5m buffer for the western hedgerow, as well as DVT's at the townhouse block entrance.   |
| d) Demonstrate how 333 Woolwich Street could be incorporated into the proposed development, should it be developed in the future.                                     | <p>It is proposed that the Townhouse block will be a condominium development and as such an expansion of the condominium would not be possible. Note, given the location of the house on 333 Woolwich Street, there is no opportunity to expand into this lot from the proposed development without demolition of the existing house which is not economically viable. Further, the subject development does not preclude severing 333 Woolwich Street into smaller single lots should that be proposed in the future.</p> <p>Development of 333 Woolwich Street would also be limited by the provision of entrances to the property given its proximity to the traffic circle. At most we see this lot being subdivided into two lots or developed for a triplex or some other smaller form of residential development that would only require a single access.</p> <p>Regardless, the current development proposal does not hinder the future development potential for 333 Woolwich.</p> |

| <b><i>Municipal Comment</i></b>   | <b><i>Response</i></b>  |
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| e) Demonstrate how the concept plan will mitigate impacts on 333 Woolwich Street while the lot is used and maintained as is.                      | <p>Please see revised concept plan for proposed layout and development of lands near 333 Woolwich Street. It is noted that 3 proposed residential units will be adjacent to 333 Woolwich Street:</p> <ul style="list-style-type: none"> <li>- Lot 5 will be situate so that the side of the new home would face the back yard of 333 Woolwich Street. This is not uncommon and given it is the side of the house will have minimal impact.</li> <li>- Lot 6 will have its house situated such that it will be in the “front yard” of 333 Woolwich Street. Lot 6 will also be buffered from the existing residence by the inclusion of the 3.0m wide servicing corridor and trail connection that is being proposed in this area.</li> <li>- Unit B4 of the Townhouse block will flank 333 Woolwich Street and will have limited windows facing 333 Woolwich Street.</li> </ul> <p>Thus privacy of 333 Woolwich Street's rear yard is maintained to a great extent. Landscaping (both existing and proposed) and fencing will be further refined and detailed through the site plan approval process to provide screening to the greatest extent possible.</p> |
| f) Incorporate a walkway connection from the Townhouse block to the multi-use trail to the east.  | Done. Note, given the engineering requirements of the multiple block, stairs were required to transition from the development to the existing multi-use trail on Woolwich. At time of detailed Site Plan design, this can be further explored.  |
| g) Show roundabout and multi-use trail on concept plan.   | These elements have been added to the concept site plan.  |
| h) Show potential pathway connection to City owned lands located to the south of the subject site.  | <p>To the south are protected environmental lands and we would not recommend a path to this area.</p> <p>There is a Multi-Use Trail with easy access via the proposed walkway to the east, as well as via the proposed driveway and sidewalks to Woolwich Street to the north.</p> <p>For 16 residential units, we believe this facilitates appropriate pedestrian access.</p>  |
| i) Demonstrate the proposed Condo parcel frontage is wide enough to accommodate the condo road and a 3.0.x3.0m driveway daylight corner triangle. | DVT's have been provided at the entrance to the townhouse block. As a result the number of lots proposed facing Woolwich Street in this area has been reduced.  |
| <b><i>Access Review Study</i></b>   |   |
| 1. Include concept plan of the site with location points, discussed under Sight Distance, clearly identified on the concept plan.                 | See attached. Also attached are redlines of the Woolwich Street engineering drawings (plan and profile) demonstrating the sight lines. Finally, photos of critical views are included.  |

| <b><i>Municipal Comment</i></b>  | <b><i>Response</i></b>  |
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| <b><i>General Summary of Concerns Raised by Residents</i></b>  |   |
| a) Would like developer to put up a fence between 333 Woolwich Street and lands to be developed.                                   | A temporary fence will be put up during construction and permanent options can be discussed with the property owner and detailed through the Site Plan Approval process for the Townhouse block.  |
| b) Concern about loss of privacy, tree removal, the impact of lighting from proposed development onto adjacent lots.               | <p>Proposed residential units immediately adjacent to existing Dwellings are flanking (side facing) the property lines. Accordingly, minimal windows and loss of privacy are expected.</p> <p>Any tree removals, as well as proposed planting and fencing will be determined through the site plan approval process.</p> <p>Similarly, a Lighting Plan will be part of the Site Plan Approval process.</p>  |
| c) Concerned about accidents at the new roundabout with additional traffic and additional driveways being close to the roundabout. | <p>We note that the Traffic Circle is not a “RoundAbout” and operates differently. Traffic volumes are relatively low and observations during peak operating times show no operational issues (no queued vehicles) nor have we heard reports of any issues.</p> <p>The operating speed in and on the approaches to the Traffic Circle are very low (15 to 20 kph), and there are good sight lines and visibility in proximity to the Traffic Circle.</p> <p>Also, it is our understanding that during the Woolwich Street Class EA and design that “Ultimate” traffic volumes were estimated in consultation with the City and Region considering full build out of all development lands within the Woolwich Street catchment area (i.e., between University Avenue and Bridle Trail) and thus consideration for the subject development was accounted for. The Paradigm “Access Assessment” also used the “Ultimate” build out forecasted traffic numbers.</p> <p>It is noted that existing driveways on the approach legs to the Traffic Circle are closer to the Traffic Circle than those proposed under the subject development, and again we are aware of no operational issues.</p> <p>Finally, the scale of the subject development is negligible compared to the existing and proposed development in the area.</p> <p>Accordingly, we do not believe the subject development will cause “accidents” at the Traffic Circle.</p> |

| <b>Municipal Comment</b>  | <b>Response</b>  |
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| d) Increased density will bring additional traffic and will increase the potential for accidents.   | The Paradigm "Access Assessment", previously reviewed by the City, has not raised concern. Further, the proposed development is negligible compared to the existing and proposed development in the area, and again, the City's traffic study prepared during the Woolwich EA considered full build out when designing the roadways.   |
| e) Reduction of Landscape Open Space and Common Recreation Area is a concern.   | Under the City's new Zoning By-Law, Common Recreational Area is not required for this type of development. Regardless, the proposed Site Plan provides an amenity area. The min. landscaped area is 25% rather than 30%, but this does not include 20% of the site being conveyed to the City as Open Space. In addition, the surrounding area has significant open space and recreation areas within easy access of the site.                       |
| f) Small single detached lots proposed are not consistent with the neighbourhood character, consisting of larger lots.  | We disagree. Similar existing and proposed development exists to the immediate west and south of the proposed development. Regardless, the revised Concept provides larger Single Detached Lots and a reduced number of overall units compared to the previous proposal presented to the City and public. Further, the location of the Townhouse Block is situated behind the single lots and thus visibility to the Townhouse will be very limited. |
| g) The proposed development feels crowded (22 townhomes & 10 single detached homes on 3 lots) and does not fit into the existing surroundings that are established, larger homes on large treed lots. | The revised Concept has been reduced to 24 units (8 Single Detached Lots and 16 Townhomes) – previously a total of 32 units was proposed. Also, see response to previous point (f).  |
| h) The 10 single detached homes should be reduced to 5 single detached homes.   | The revised Concept has been reduced to 8 Single Detached Lots   |
| i) The proposed development does not provide sufficient protection for the wildlife corridor.   | A 5.0m (minimum) buffer along the wildlife corridor has been incorporated into the updated proposal.   |
| j) The 120m circulation distance is too small.  | This is a requirement of the City and the <i>Planning Act</i> , but does not prohibit comments from other members of the public.   |
| k) The aesthetic of the upscale houses will be diminished by the proposed large development across the street.  | The Single Detached Lots will be fronting Woolwich Street, and there will be very limited visibility of the Townhomes from Woolwich Street. Further, the Townhomes will themselves be aesthetically pleasing (see concept renderings).   |
| l) Having additional driveways along this section of Woolwich Street will increase the risk of collision as people back out of their driveway.  | See c. & d. above. The developer cannot be held responsible for driver's capabilities. Woolwich Street has been designed to municipal standards and has appropriate sightlines, etc.   |
| m) Density on site should be reduced by removing the townhomes and replacing them with single detached dwellings.   | See g. above. Further, given the subject properties' configuration and depth, this would not be possible.  |

| <b><i>Municipal Comment</i></b>  | <b><i>Response</i></b>   |
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| n) Single detached parcels are too small (narrow), not leaving enough room for landscaping in the front yard. If proposed houses will be anything like the ones in Steeplechase subdivision then houses will be too close together and too close to the street with parked cars hanging into the Woolwich Street right-of-way. | The proposed Single Detached Lots in the revised Concept have greater frontage. The design of the homes has not been finalized, but the Lot size and City required setbacks allow for ample driveway and landscaping areas.  |
| o) Property values of the multi-million dollar homes will be diminished by the townhomes or smaller single detached homes.   | New development in an area is not proven to diminish existing property values, and in fact property values have increased dramatically while the area experiences development.   |
| p) Concerned that there are not enough visitor parking spaces provided to be practical.  | Visitor parking is being provided.   |
| q) Concerned about increased traffic not just at Woolwich Street and Falconridge Drive, but also at Bridge Street West and Woolwich Street, and Woolwich Street and University Avenue East.  | The developer cannot be responsible for increased traffic throughout the neighbourhood. Further, we note the scale of the development is negligible compared to the development in the area. Finally, the City's EA traffic study, and the Paradigm study, both used <b>ultimate</b> (full build-out) traffic forecasts for the Woolwich Street catchment area (including the subject development) and didn't identify issues (see preceding point c) ). |
| r) The proposed development does not address Section 2.D.1 of the Waterloo Zoning By-law Amendment and Consents `which states "respects the scale, physical characteristics, and context of established neighbourhoods in areas where re-urbanization is expected to occur" please show us respect.                            | The proposed development is in keeping with the majority of development and dwellings in the surrounding area; with the exception of a few much bigger properties – that are the exception, not the norm. To build similar to this scale would be against the principle goals of Provincial, Regional and City Planning Policies, and not be in keeping with other adjacent developments.  |
| s) Concerned that the proposed development will have an impact on Emerald Lake.  | As described in the June 2018 Scoped Hydrogeological Assessment, no impact is anticipated on the River Oak Estate lakes as surface and ground water flow direction is not toward this feature (refer to Hydrogeological study).  |
| <b><i>Attachment #1 – Waterloo Advisory Committee of Active Transportation</i></b>   |  |
| 1. The Site is well connected to the Walter Bean Trail along Woolwich Street.  | Agreed   |
| 2. Consider creating pedestrian linkages to Woolwich Street to the east by using the 3.0m easement, continuing the sidewalk across the Townhouses.   | A pedestrian linkage to the east from the townhouse block through the 3.0m storm connection / walkway area is now proposed to provide this connection.   |
| <b><i>Attachment #2 – City of Waterloo Transportation Services</i></b>   |  |
| 1. Recommend sufficient parking be provided on-site to meet regular demands of residents and visitors without reliance on municipal on-street parking.   | Each townhouse unit is to have a private driveway and single car garage. Visitor parking is also provided with six (6) spaces proposed.  |
| 2. A Conceptual Workspace Management Plan should be provided to show how construction staging for this site will be managed, as there is no parking on Woolwich Street.  | This will be prepared as part of the final design and Site Plan Approval process.  |

| <b><i>Municipal Comment</i></b>   | <b><i>Response</i></b>  |
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| <p>3. Recommend Traffic Counts be updated now the reconstruction of Woolwich Street is complete, to reflect current conditions.</p> | <p>While Woolwich Street has been reconstructed, it remains a two lane road as it had been historically – the reconstruction would not cause increased traffic, especially as Woolwich Street is not a through road and that the lands it services are “land locked” between University Avenue and Bridle Trail.</p> <p>Further, it is noted that the Paradigm “Access Assessment” used <b>ultimate</b> buildout traffic data that had been generated as part of the City’s Woolwich Street Class EA traffic study (by IBI Group). The City’s Class EA traffic study had been prepared in consultation with Waterloo, Kitchener and the Region and had identified all potential development land accessed by Woolwich Street. The prediction of the ultimate traffic in this case would have been relatively straightforward as the development lands accessed by Woolwich Street are isolated due to the Grand River, and Woolwich Street is the only access. The Woolwich catchment area is still in a state of development with significant lands unoccupied. Thus existing traffic volumes would necessarily be less than the ultimate forecast. Thus, doing traffic counts now would be of no benefit – the counts would be less than the ultimate volumes which had been used in the traffic studies.</p> |
| <p>4. Lots 7-10: not desirable to have multiple driveways accessing the multi-use trail.</p>  | <p>The number of single lots fronting Woolwich Street has been reduced from 10 to 8 which reduces the number of driveways.</p> <p>Woolwich Street is a relatively quiet street and we are unaware of any current operational issues. It is our opinion that the relatively small increase in the number of driveways from that which currently exists (i.e., from 5 existing to 8 proposed) is insignificant.</p> <p>Finally, we note other existing driveways currently exist in closer proximity to the intersection (i.e., the Traffic Circle) than proposed and we are unaware of any operational issues.</p>   |
| <p>5. Lots 2,3,7,8,9 &amp; 10: Ensure adequate sight lines for all users accessing the right-of-way.</p>                            | <p>Refer to the Paradigm “Access Assessment”.</p> <p>It is observed that the north-south leg of Woolwich Street has a straight alignment with no significant vertical deflection to impact sight lines. There are existing driveways on the east side of the road in closer proximity to the Traffic Circle, and no operational issue have been reported. Similarly, on the east-west leg of Woolwich Street there are existing driveways (1 of which is closer to the Traffic Circle, and 4 of which will be decommissioned and replaced with 5 new driveways for the new single detached lots.</p>  |

| <b>Municipal Comment</b>   | <b>Response</b>   |
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|  | Further, it is noted there are existing driveways on the development lands in similar proximity of the proposed driveways. There are also existing driveways in closer proximity to the Traffic Circle (i.e., 332 and 333 Woolwich Street) than proposed. We are unaware of any operational issues.   |
| <b>Attachment #3 – City of Waterloo Growth Management Division</b>   |   |
| <b>Land Use Comments - Official Plan</b>   |   |
| 6. Lands designated Low Density Residential in the Official Plan, density is 150 bedrooms per hectare. Proposed densities conform to the Official Plan. Planning Approvals should consider requiring a site specific ZBA to change measure of density from units/ha to bedrooms/ha to be consistent with Official Plan and forthcoming zoning by-law.          | Revisions to the site plan, including increased buffers and the conveyance of environmental lands have resulted in less developable area. The townhouse block area is now 0.46ha (formerly it was 0.65 ha). Thus the 150 bedrooms/ha equates to 69 bedrooms in the townhouse project. The revised site plan proposes 16 units which would permit over 4 bedrooms per unit ( $69 / 16 = 4.3$ ). We believe the project is in compliance to the maximum density allowances. |
| 7. Lands immediately to the south are designated Open Space in the Official Plan and contain Core Natural Features and Supporting Natural Features.  | Acknowledged.   |
| 8. Proposed land uses are consistent with the land uses contemplated in the Official Plan.   | Acknowledged.   |
| 9. If no parkland is to be designated, applicant will be required to provide cash-in-lieu of parkland. Environmental Buffer areas may not be considered as contributing to parkland dedication requirements.   | Acknowledged.   |
| <b>Land Use Comments – Lexington District Plan</b>   |   |
| 10. Majority of lands are designated Low Density and assigned a maximum density of 45 persons/ha. This relates to servicing constraints that were present when the Plan was adopted in 1978. Planning Approvals will need to confirm with the City's Engineering division whether these constraints continue to exist for the subject lands.                   | The land area is 0.99ha translating to a maximum of 45 persons per the guideline. This is negligible compared to the overall municipal service area. Please advise if City Engineering has completed this review and if any concerns remain.  |
| 11. A small portion of the subject lands is designated as a linear park, demonstrating the intention to ensure open space connection in the general area of the proposed development. The connection could make use of the existing hedgerow on the western edge of the subject lands to function as an ecological corridor rather than a pedestrian corridor. | A 5m buffer to the hedgerow is incorporated into the updated concept which provides for an ecological corridor as suggested. This is similar to that provided on the west side of the hedgerow. This Buffer will provide protection to the offsite and highest quality trees onsite within the hedgerow.  |
| <b>Environmental and Other Technical Comments</b>  |   |
| 1. Concept Plan shows 'Common Recreational Area' north of wetland buffer; however Proposed Site Grading Plan shows area of parking area with significant change in grade.  | The updated concept plan illustrates a central common amenity area on site. Grading plans have been prepared and show the proposed grading.   |

| <b><i>Municipal Comment</i></b>  | <b><i>Response</i></b>  |
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|  | Final grading plans would be prepared during the Site Plan Approval stage.  |
| 2. The Functional Servicing Report notes that the high water table is essentially at the ground surface, with Scoped Hydrological Assessment stating it may be as high as 317.5 in the northwest corner and 315 in the southeast corner. This will need to incorporate basement elevations that are above the seasonally high water table. However, the Proposed Site Grading Plan does not appear to accomplish this. This should be addressed and confirmed.       | The final design during the Site Plan Approval stage of the project will ensure the residential units are not impacted by the water table. We note that there are existing houses in the location of the proposed single family houses and that these houses have no existing groundwater issues. The proposed house basements will be above the existing house basements. Further, the townhouse basements will be at or above existing grade.   |
| 3. The Functional Servicing Report proposes two superpipe storage areas to provide stormwater quantity control. Given the high water table, will infiltration into the pipes be an issue?  | No, for the following reasons:<br><ol style="list-style-type: none"> <li>1. Modern sewer pipes are watertight.</li> <li>2. Even if there was a minor amount of infiltration to the sewer, it would not be retained as there is a gravity outlet to the superpipe. As well, the infiltration would be insignificant compared to the volume of stormwater entering the system.</li> <li>3. Stormwater will enter the sewer system from a higher elevation than the groundwater. Accordingly, the stormwater will have greater head (pressure) and temporarily stop any infiltration that might be occurring.</li> </ol> |
| 4. Staff are satisfied with the recommendation in the Scoped Hydrological Assessment that a during and post-development groundwater monitoring program is not necessary.   | Acknowledged.   |
| 5. 'Evaluated' and 'Non-Evaluated' wetlands in EIS figure 2 do not correspond to ELC mapping or surveyed wetland limits shown on Concept Plan and Proposed Grading Plan. The staked wetland limits need to be shown on figure 2, along with the extent of the buffer. It is not clear why the staked limits do not align with the ELC mapping. Further, the staked wetland limits appear in a different location on the Concept Plan than the Proposed Grading Plan. | The points labeled "WLB" are the surveyed locations flagged with the GRCA and our Ecologist during a site walk in the fall of 2017 and represent the wetland boundary for the subject property.   |
| 6. The EIS does not consider the northeastern part of the wetland to be part of the PSW. City staff will defer to the GRCA as to whether this is appropriate.  | The EIS Addendum identifies that unevaluated portions of wetland located both west and south of the subject site are complexes with the PSW   |
| 7. On page 6 of the EIS it is noted that there is a mowed trail extending from the southwest corner of the subject lands onto City owned property. Based on the adjacent subdivisions, this is not a City-sanctioned trail and it is presumed the mowing will stop given a change in ownership, however, this should be confirmed.   | The EIS Addendum identifies that use will not continue and a greater density of plantings and use of thorny plants such as raspberry species will be implemented  |

| <b><i>Municipal Comment</i></b>   | <b><i>Response</i></b>  |
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| 8. The breeding bird and amphibian call survey locations should be shown on figure 2 of the EIS.  | The locations are illustrated on the revised Figure 2.  |
| 9. Under Section 3.4.4.1 of the EIS notes that the results of a third amphibian call survey will be provided through an addendum. Is this still the intention?  | These results of this third survey are provided in the EIS addendum. No amphibian calls were recorded.  |
| 10. The EIS recognizes that the timing of construction activities must have regard for the breeding bird season. A timing window of April 1 to September 10 should be used. All land clearing, earthen, servicing and infrastructure works and tree removal between April 1 and September 10 should be prohibited unless a nesting survey is undertaken that demonstrates activities will not have the potential to disturb or destroy migratory birds or their active nests.   | A note has been added to the EIS Addendum that land clearing and tree removal to accommodate these development activities must avoid the provided timing window.  |
| 11. The EIS does not include the results of a significant Wildlife Habitat screening exercise to identify candidate or confirmed Significant Wildlife Habitat; although it was specified in the comments provided by City staff on the EIS Terms of Reference.  | The SWH screening exercise is provided as an appendix to the EIS Addendum.  |
| 12. The EIS notes there were 11 element occurrences within the applicable NHIC square but only references 3 species. Do the 3 listed species account for all 11 occurrences?<br><br>Furthermore, the EIS does not include the results of a Species at Risk and Species of Conservation Concern screening exercise, although it was specified in the comments provided by City staff on the EIS Terms of Reference.  | The 11 element occurrences result from multiple records of Eastern Meadowlark. This information has been clarified in the EIS Addendum.<br><br>A SAR and SCC screening exercise has been provided and is provided as an appendix to the EIS Addendum.   |
| 13. The proposed 10m buffer has not been adequately justified. 30m is generally used as a guideline, especially for PSW's.<br><br>Should it be determined that the northeastern portion of the wetland is not part of the PSW, then it still remains a Locally Significant Wetland in the Official Plan, which provides a buffer guideline of 15m<br><br>In addition, the EIS is focused on the portion of wetland south of the site and does not adequately address the finger that extends up along the western boundary. The wetland finger is identified as a Willow Mineral Deciduous Thicket Swamp in the ELC mapping shown on figure 2. For the adjacent | The EIS Addendum identifies that the adjacent unevaluated wetland portions to be complexed with the PSW.<br><br>Larger buffers are provided in the updated concept that is illustrated in the EIS Addendum. Plantings within these buffers of native species of trees and shrubs will be implemented and ecological enhancement measures are recommended and will require additional detail through the creation of a landscape restoration plan. |

| <b><i>Municipal Comment</i></b>  | <b><i>Response</i></b>   |
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| subdivision, a detailed analysis was undertaken which justified a 15m buffer for the wetland finger. Restoration plantings were also provided within the 15m buffer.   |  |
| 14. The EIS notes the buffer will be assumed by the City. However, there is a substantial retaining wall along the edge of the buffer which is presumed would be in private ownership and would pose a significant challenge in terms of maintenance and functionality. In addition to being secured in public ownership, it should also be placed in an open space zoning category.   | The buffer lands and retaining wall (built inside the buffer) will be assumed by the City will also be zoned Open Space (OS3)  |
| 15. Standard black vinyl chain link fencing should be installed along the public-private interface (i.e. limits of the buffer).  | Acknowledged. To be detailed at the Site Plan Approval stage.  |
| 16. The EOS drawing 3 shows two bat houses mounted on poles for the proposed buffer. The City will not want to assume responsibility for these, so it should be confirmed that the requirements of the Endangered Species Act are still being met without the bat houses being installed.  | The bat boxes have been deleted. The trees to be removed on the site are not associated with forests or swamps.  |
| 17. The EIS states that the hedgerow is located immediately to the west of the site, however the ELC mapping suggests a portion of it is on the subject property. To be consistent with the Official Plan and adjacent subdivision, the hedgerow should be protected, buffered, enhanced with plantings, conveyed to the City and zoned Open Space. When combined with the buffer for the wetland finger, this would translate into a strip of land along the entire western property boundary. Further, appropriate measures will need to be taken to ensure grading does not interfere with the trees in the hedgerow. | A 5m (minimum) buffer is now shown along the western property boundary. This buffer will allow for the protection of offsite and the highest quality onsite trees. Enhancement with new planting within the buffer has been added to EIS Addendum. |
| 18. The incorporation of sustainable design, construction and operation approaches are strongly encouraged.  | Acknowledged.  |
| 19. Based on hydrogeological works completed it is not anticipated that the proposed development would impact the lakes within River Oak Estates. However, to confirm this, a professional opinion should be sought by the applicant's hydrogeologist.   | CVD (Sandy Anderson) confirms that the development will not impact the lakes within the River oak Estate – see attached email in Appendix "A".   |

| <i>Municipal Comment</i>   | <i>Response</i>   |
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| <b>Attachment #4 – City of Waterloo Engineering Services</b>   |   |
| <b>Development Engineering</b>   |   |
| 1. Grading & drainage from the site is to be designed such that overland flows do not negatively impact adjacent properties. The major overland flow route from the townhouse block will need to be designed and supporting calculations submitted to confirm adjacent properties will not be affected.  | It is noted that the preliminary Engineering design completed to date respects this requirement. During Site Plan Approval the detailed engineering will be completed to ensure this constraint is respected. |
| 2. The storm sewer servicing design in the Woolwich Street road allowance will need to be further evaluated and discussed during the design stage to clarify why a direct perpendicular connection to the 300mm storm sewer is not proposed.   | Acknowledged. This will be explored as part of the detailed engineering in the Site Plan Approval stage.  |
| 3. A maximum swale length of 30m should be considered along the back of the townhouse blocks.  | This will be explored as part of the detailed engineering in the Site Plan Approval stage.  |
| 4. Engineering services will only permit one water service per property. Further evaluation and discussions on the multiple service connections and metering to the townhouse blocks will be required at the Site Plan stage, and the developer must be prepared to confirm if the property will be divided through the condominium corporation process. | Acknowledged.   |
| 5. A detailed water distribution analysis evaluating fire flow and domestic flows will be required at the detailed design stage.   | Acknowledged.   |
| 6. In reviewing the hydrogeological assessment it appears the seasonal-high groundwater table may be as high as 317.5m for the area. The development design must incorporate basement elevations that are above the seasonal high water table.   | Acknowledged.   |
| 7. There is a significant grade difference across the property. During detailed design stage please ensure embankments do not exceed a 5:1 slope and all landscape areas fronting one of the municipal roads should not exceed 10%. Use creative landscaping techniques to reduce grades.  | Acknowledged.   |
| 8. A Utility plan will be required with the detail design indicating the location of Waterloo North Hydro, gas, and communication services.  | Acknowledged.   |
| 9. GRCA approval should be gained prior to engineering approval.   | Acknowledged.   |

| <b><i>Municipal Comment</i></b>  | <b><i>Response</i></b>   |
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| 10. In reviewing Section 5.0 of the Functioning Servicing Report, it appears the groundwater conditions are essentially at ground surface in the area. Foundation drains, footings, or sump pumps may not be connected to the storm or sanitary sewer system.  | Acknowledged.  |
| 11. Design on the super pipe must consider groundwater conditions, hydrostatic pressure, and dewatering requirements.  | Acknowledged.  |
| <b>Landscape Site Plan Comments</b>  |  |
| <p>1. Every effort must be made to preserve the existing hedgerow located behind proposed lots 1 and A1-A8. Prior to approval of the Zoning Bylaw Amendment, we request the following detailed information is submitted to the satisfaction of Development Engineering and the City of Waterloo Manager of Forestry Services.</p> <p>a) Sediment and Erosion Control Plan with tree protection fencing incorporated (location shown, acceptable detail of fencing provided that meets City of Waterloo standards, and tree protection notation).</p> <p>b) Detailed Grading Plan that clearly lays out the existing and proposed grades along the westerly property boundary and demonstrates that every effort will be made by the applicant and contractors to protect the existing hedgerow.</p> <p>c) Vegetation Management Plan that details the existing tree/shrub species, tag number, DBH, condition (health &amp; structure), remarks, and proposed action to preserve or remove for the entire site. This plan must include information for all existing trees &amp; shrubs on the property, and within 6m of the property line on adjacent properties.</p> | <p>Acknowledged.</p> <p>We refer to the existing preliminary design completed for the site to date and note that this protection was provided.</p> <p>We believe that the requested designs and plans are a final design matter and will be addressed as part of the Site Plan Approval process.</p> |
| 2. Recommend the requirement to preserve the hedgerow is included in any agreements between the applicant and the City as a result of an approved ZBA with a minimum replacement requirement that is included within that agreement.   | The hedgerow will be preserved and future lotting and grading will accommodate the preservation of a hedgerow block along the west side of the site; but individual tree preservation within the hedgerow will be subject to review of existing conditions by an arborist.                           |
| 3. Include a note on the Vegetation Management Plan that the timing of construction activities must have regard for the breeding bird season. A timing window of April 1 to September 10 should be used. All land clearing, earthen works, servicing works, infrastructure works, and tree removal between April 1 to September 10 should be   | These windows of work to protect wildlife will be incorporated into subsequent submissions.  |

| <b><i>Municipal Comment</i></b>   | <b><i>Response</i></b>   |
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| prohibited unless a nesting survey is undertaken that demonstrates the activities will not have the potential to disturb or destroy migratory birds or their active nests.  |  |
| 4. Clarify if parking spaces are proposed to encroach within Common Recreational Area.<br><br>If parking spaces are required, advise what amenities these spaces will cater to.   | The parking spaces have been re-located. See revised Concept Plan  |
| 5. Provide details of proposed Common Recreational area, including site furnishings and layout.   | Details will be provided through the Site Plan Approval process. The programming of this area should not be a requirement of a Zoning By-Law Amendment process and the consideration should be that an appropriately located and sized area is provided. |
| 6. Fencing on site:<br>a) Install black vinyl chain link fence along public-private interface (i.e. buffer limits)<br>b) Fencing of other rear yards should be decorative wood fence, 6' in height and using 6"x6" posts. Provide location information of all fences proposed on site and detailing how hedgerow will be protected during fence installation. | Acknowledged. These are Site Plan Approval issues.   |
| 7. 7. Provide street trees within public ROW in front of lots fronting Woolwich Street if the boulevard width will allow. Coordinate through engineering if sidewalks are also required.  | Acknowledged. This is a Site Plan Approval issue.  |
| 8. 8. Additional landscape details & requirements will apply through Site Plan Review.  | Acknowledged.  |
| <b>Active Transportation</b>  |  |
| 1. Concept Plan and Site Grading Plan do not match. Difference in Parking.  | Detailed Grading Plans will be prepared during Site Plan Approval.   |
| 2. Plans should show updated road construction. Tie in to multi-use path and sidewalk.  | Done.  |
| 3. Sidewalks should be placed through Townhouse driveways with boulevard, apron and curb design.  | Done   |
| 4. Can a walkway be added to the easement block to connect townhouse complex with Woolwich Street.  | Done.  |
| 5. Internal sidewalks don't connect and just end at parking. Internal sidewalk design should consider pedestrian connection.  | Done   |

| <b>Municipal Comment</b>   | <b>Response</b>      |
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| <b>Attachment #5 – Planning, Housing and Community Services, Region of Waterloo</b>  |                      |
| <b>Water Services</b>  |                      |
| <p>1. The proposed residential units would be serviced by municipal water and wastewater services extended from Woolwich Street. The lands are located in Waterloo Zone 4 with a static hydraulic grade line of 381 mASL. Any future development with a finished road elevation below 324.8 mASL will require individual pressure reducing devices on each water service in accordance with Section B.2.4.7 of the Design Guidelines, and Supplemental Specification for Municipal Services dated January 2018.</p>  | <p>Acknowledged.</p> |
| <b>Source Water Protection</b>   |                      |
| <p>2. To prevent or mitigate any potential impacts of road salt from the proposed townhouse block on the Regions groundwater resources, the Region requires a Salt Management Plan (SMP). This can be submitted as part of the future Site Plan Application for the townhouse block, with implementation of the SMP being potentially secured through a future Condominium application.</p> <p>Regional staff would encourage the following to be incorporated into the SMP:</p> <ol style="list-style-type: none"> <li>1) Ensure cold weather storm water flows are considered in the site design. Consideration should be given to minimize the transport of melt water across the parking lots or driveway. This also has the potential to decrease the formation of ice, thereby reducing the need for de-icing.</li> <li>2) Directing downspouts towards pervious (i.e. grassy) surfaces to prevent runoff from freezing on parking lots &amp; walkways.</li> <li>3) Locating snow storage areas on impervious surfaces.</li> <li>4) Locating snow storage areas in close proximity to catch basins.</li> <li>5) Using winter maintenance contractors that are Smart About Salt certified.</li> <li>6) 6. Using alternative de-icers (e.g. pickled sand) in favour of road salt.</li> </ol> | <p>Acknowledged.</p> |
| <p>3. Subject lands are currently serviced by municipal water and private septic systems. Any historic private wells and existing private septic systems on the lands will need to be decommissioned in accordance with applicable Provincial legislation.</p>   | <p>Acknowledged.</p> |
| <b>Corridor Planning</b>   |                      |

| <b>Municipal Comment</b>   | <b>Response</b>   |
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| <p>1. Regional Staff have reviewed the Road Traffic &amp; Feasibility Noise Impact Study (May 28, 2018) submitted by JJ Acoustic Engineering Ltd, and concur with its recommendations. To mitigate transportation noise from Woolwich Street, the proposed development will require the following noise attenuation measures:</p> <ol style="list-style-type: none"> <li>1) All residential units must have provision for an air conditioning system.</li> <li>2) The applicants must enter into an agreement with the City of Waterloo and the following clauses shall be included in agreements of Offers of Purchases and Sale, and lease/rental agreements:</li> <li>3) <i>Warning Clause A:</i> Purchasers/tenants are advised that sound levels due to increasing road traffic may occasionally interfere with some activities of the dwelling occupants as the sound levels exceed the sound level limits of the Region of Waterloo and the Ministry of the Environment, Conservation and Parks.</li> <li>4) <i>Warning Clause C:</i> This dwelling unit has been designed with the provision for adding central air conditioning at the occupant's discretion. Installation of central air conditioning by the occupant in low and medium density developments will allow windows &amp; exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound level limits of the Region of Waterloo and the Ministry of the Environment, Conservation and Parks.</li> </ol> | <p>Acknowledged.</p>  |
| <p>2. Based on the existing separation distance between the Piller's plant and the proposed development, the noise study indicates that the Piller's plant is not likely to create a noise impact on the proposed development. As a result, no mitigation is required in this regard.</p>  | <p>Acknowledged</p>   |
| <b>Environmental Planning</b>  |   |
| <p>1. Regional Staff, in consultation with the GRCA have reviewed the Scoped Environmental Impact Statement (June 13, 2018) submitted by Burnside &amp; Associates Inc. and have determined it does not satisfactorily address the criteria outlined in ROP Policy 7.C.10 specifically, the EIS has not adequately assessed the unevaluated wetland for complexing with the adjacent Merlitzer</p>   | <p>The EIS Addendum has identified that the unevaluated wetland portions are complexed with the PSW and additional buffers have been applied.</p> |

| <b>Municipal Comment</b>  | <b>Response</b>  |
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| <p>Creek PSW, or provided adequate justification for the reduced buffer recommended in the EIS. As a result, the applicant will need to assess the unevaluated wetland for complexing with Merlitzer Creek PSW prior to further consideration of this application.</p>  |  |
| <p>2. Applicants are advised that if the unevaluated wetland is complexed with the adjacent PSW, the entire wetland would be considered a Core Environmental Feature and would require additional buffering in accordance with ROP Policy 7.C.11 which requires appropriate buffers to protect Core Environmental Features from adverse environmental impacts, provide opportunities for net habitat enhancement or, wherever feasible, restore the ecological functions of the Core Environmental Features. ROP Policy 7.C.11 further identifies a minimum 10 metre buffer from all Core Environmental Features.</p>   | <p>Additional buffer width that exceeds the 10 metre minimum have been applied to the unevaluated wetland portions The EIS Addendum identifies that installation of native plantings within the existing manicured turf area will enhance the natural heritage functions</p>                     |
| <b>Regional Fees</b>  |  |
| <p>1. The applicants have paid the following fees:</p> <ul style="list-style-type: none"> <li>- Review of Zoning By-law Amendment Application - \$1,150</li> <li>- Review of Scoped Environmental Impact Study - \$2,300</li> </ul>   | <p>Acknowledged</p>  |
| <b>Attachment #6 – GRCA</b>   |  |
| <p>1. GRCA Staff have reviewed the Scoped Environmental Impact Statement (June 13, 2018) prepared by R.J.Burnside. We are not in a position to recommend approval of the study at this time. The following comments need to be addressed:</p> <p>2. The unevaluated wetland should be evaluated for complexing with the adjacent Provincially Significant Wetland and provided to the MNRF. A re-assessment of impacts and determination of an appropriate buffer should be undertaken upon completion of the complexing exercise.</p> <p>Assuming it will be complexed, it must be demonstrated that there will be no negative impacts on the natural features or their ecological functions.</p> <p>We are not satisfied that the proposed buffer range of 6.3m to 10.0m will ensure the protection of the wetland.</p> | <p>The EIS Addendum has identified that the unevaluated wetland portions are complexed with the PSW and additional buffers have been applied. The expanded buffers and proposed planting enhancement within the buffers will prevent impacts to the natural heritage features and functions.</p> |

| <b><i>Municipal Comment</i></b>   | <b><i>Response</i></b>   |
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| <p>3. We note that if the adjacent wetland is complexed and is Provincially Significant, a minimum 10 metre buffer would be required as per Regional Policy.</p> <p>The EIS mentions the proposed development and buffer is consistent with surrounding development, however it does not mention the new subdivision to the west which maintains a 30 metre buffer to the residential lots with some encroachment for the road and storm water management facility.</p> <p>The buffer recommendations for the new development adjacent to this property should be considered in the re-assessment and determination of an appropriate buffer.</p> | <p>The buffer applied to the adjacent wetland exceeds 10 m in the revised concept.</p>   |
| <p>4. We also note that the wetland boundary west of the property (ELC Community SWTM3 on Figure 2 of the EIS) and a buffer to this feature is not shown on Figure 3 of the EIS or the development concept. All wetlands adjacent to the property and their buffers must be shown, and the buffers should be zoned Conservation (OS3) on the zoning schedule to ensure its long-term protection.</p>  | <p>A buffer has been applied to this wetland portion in the updated concept shown on Figure 3. Zoning will conform as noted.</p> |
| <p>5. Any future development on the property will require prior written approval from the GRCA in the form of a permit pursuant to Ontario Regulation 150/06.</p>   | <p>A permit application will be submitted as part of this development process.</p>   |
| <p>6. We require additional time to review the Scoped Hydrogeological Assessment and Functional Servicing Report. We will update our comments upon completion of the review.</p>  | <p>Acknowledged.</p>   |
| <p>7. We will undertake a detailed review of the concept plan and grading plan during the Site Plan review process.</p>   | <p>Acknowledged.</p>   |
| <p>8. This zone change application is categorized as major, therefore a fee of \$2,175 has been invoiced to the applicant.</p>  | <p>Acknowledged.</p>   |
| <p>9. Upon submission of the Site Plan an additional fee will be required.</p>  | <p>Acknowledged.</p>   |
| <p>10. A separate fee will be required for a GRCA permit.</p>   | <p>This has been paid.</p>   |
| <b>Attachment #7 – Waterloo North Hydro Inc.</b>  |  |
| <p>1. WNH has overhead distribution lines on Woolwich Street. WNH intends to maintain the overhead distribution system on all abutting streets.</p>   | <p>Acknowledged</p>  |
| <p>2. The proposed buildings must be set back a minimum of 5.0m from the overhead primary conductors.</p>   | <p>Acknowledged</p>  |

| <b><i>Municipal Comment</i></b>  | <b><i>Response</i></b>  |
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| 3. The City of Waterloo should review the pole locations in relation to any planned road widening. A larger building set back may be required to facilitate the relocation of WNH's poles. | Please advise if the City has completed this review and any impact to the proposal. |
| 4. Any relocation of WNH facilities will be at the expense of the requesting party.  | Acknowledged.   |
| 5. The applicant should consult with WNH throughout the Site Plan review and design phases to ensure that all WNH servicing requirements are met.  | Acknowledged.   |

Together with the comments provided in this letter and the submitted materials, we hope the revised development concept will address any issues raised.

If you have any questions or require further information, please do not hesitate to contact the undersigned.

Yours truly,



**Scott J. Patterson, BA, CPT, MCIP, RPP  
Senior Planner**

SP/s

Copy: Mr. John Perks